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Attorneys for Defendants Keenen Ivory Wayans,
Shawn Wayans, Marlon Wayans,
Wayans Bros. Productions, and
St. Martin's Press, Inc. (now known as
SMP (1952) Inc.)

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

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1 I, Paul Slevan, declare as follows:

2 1. Beginning in 1995, I became the Associate General Counsel of St.
3 Martin's Press, Inc. St. Martin's Press, LLC did not exist in 1995. I became
4 Associate General Counsel of St. Martin's Press, LLC in 1999, when it took over
5 the operations of St. Martin's Press, Inc. (which became a holding company in
6 1999). I am now General Counsel of both St. Martin's Press, Inc. (now known as
7 SMP (1952) Inc.) and St. Martin's Press, LLC. As a result of my position as
8 General Counsel of both entities, I have personal knowledge of each matter set
9 forth below.

10 2. St. Martin's Press, Inc. (now known as SMP (1952) Inc.) was named
11 as the publishing defendant in the case entitled *Jared Edwards v. Keenen Ivory*
12 *Wayans, et al.*, Case No. 2:10-cv-02231; In the United States District Court for the
13 Central District of California (the "Action").

14 3. SMP (1952) Inc. is a holding company with no current operations or
15 employees. SMP (1952) Inc. did not publish the book entitled "101 Ways to Know
16 You're a Golddigger" ("Golddigger"), which is the subject of the Complaint filed
17 by Plaintiff Jared Edwards in this Action. *Golddigger* was published by St.
18 Martin's Press, LLC.

19 4. St. Martin's Press, LLC is a New York limited liability company with
20 its principal place of business in New York City, New York.

21 I declare under penalty of perjury that the foregoing is true and correct.
22 Executed within the United States on December 15, 2010.

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28 Paul J. Slevan